

REMARKS

By this amendment, claims 21-40 are pending, in which claims 1-20 have been previously canceled without prejudice or disclaimer, claim 40 has previously been withdrawn from consideration, claim 26 is currently amended, and no claims are newly presented. No new matter is introduced.

The Office Action mailed June 10, 2009 rejected claims 26-35 as comprising non-statutory subject matter under 35 U.S.C. § 101 and claims 21-39 under 35 U.S.C. § 102(e) as anticipated by *Barry et al.* (US 6,615,258).

The rejection of claims 26-35 under 35 U.S.C. § 101 is respectfully traversed.

It is asserted in the Office Action that claim 26 is directed to non-statutory subject matter because the recited steps, e.g., “generating a response message” and “forwarding the response message,” are not tied to an apparatus or a machine.

Independent claims 26 and 31 recite a method “for providing **on-line** invoice access.” Applicants submit that “on-line” access must be tied to an apparatus or a machine, as one cannot mentally provide for “on-line” access. However, in an effort to advance prosecution, claim 26 has been amended to provide for a “**computer-implemented** method.” The claim has also been amended to make it clear that what performs the converting is a “**processor**.” Thus, the method recited in claim 26 is now clearly tied to an apparatus or a machine.

With regard to claims 27-35, the Office Action states that they are also rejected under 35 U.S.C. § 101 “based on their dependency on claim 26” (Office Action-bottom of page 3). Applicants point out that claim 31 is an independent claim, with claims 32-35 depending

therefrom. Accordingly, claims 31-35 do not depend from claim 26 and should not have been included within the rejection under 35 U.S.C. § 101.

Moreover, claims 31-35 are clearly directed to statutory subject matter because independent claim 31 recites a “computer-readable medium” which is clearly an “article of manufacture” under 35 U.S.C. § 101. Further, this article of manufacture carries thereon, “one or more sequences of one or more instructions for providing on-line invoice access,” wherein “the one or more sequences of one or more instructions” includes “instructions which, when executed by **one or more processors**, cause the one or more processors to perform the” recited steps. Since **processors** must execute the instructions, the recited method permitted by the article of manufacture is clearly tied to an apparatus or a machine, a processor constituting a machine.

Accordingly, the Examiner is respectfully requested to withdraw the rejection of claims 26-35 under 35 U.S.C. § 101.

The rejection of claims 21-39 under 35 U.S.C. § 102(e) is respectfully traversed.

Independent claim 21 recites, *inter alia*, “a conversion module configured to **compress** the invoice data for storage in a database and to **create key information for retrieving the compressed invoice data** within the database.” Independent claims 26 and 31 recite, *inter alia*, “**converting the retrieved invoice data by compressing the invoice data** for storage in a database and **creating key information for retrieving the compressed invoice data** within the database.” Independent claim 36 recites, *inter alia*, “the invoice system **converting** the

retrieved invoice data by compressing the invoice data for storage in a database and **creating key information for retrieving the compressed invoice data** within the database.”

Barry et al. does not disclose these features. It is asserted in the Office Action that col. 46, lines 8-15, of *Barry et al.* discloses these features. The cited portion recites:

The information stored in the database 1355 generally originate from different billing systems. When data is available from these billing systems, the online **invoice server typically performs a conversion process and stores the converted data on tape** until an audit approval. When the converted data is audited and approved, the data having the invoicing documents are stored to the database 1355.

Thus, while *Barry et al.* performs a conversion process and stores converted data on tape, there is no disclosure of “**compressing** the invoice data for storage in a database” or “**creating key information** for retrieving the compressed invoice data.” Accordingly, *Barry et al.* cannot anticipate the instant claimed subject matter.

Moreover, claims 24, 29, 34, and 39 are patentable separately from the independent claims from which they depend.

Claims 24, 29, and 34 recite “wherein the host supports selecting figures presented in the invoice document for **performing an arithmetic operation on the selected figures.**” Claim 39 recites “**highlighting** figures on the image of the invoice document; and **performing an arithmetic operation of the highlighted figures.**” These features are not disclosed in *Barry et al.*

The Office Action refers to “figure 56” (presumably, Fig. 17 was intended) and online invoicing server 1350 storing documents from different billing systems and performing various database queries and function calls in response to requests received from the customer via the online invoicing proxy 1340, as disclosing the feature of “wherein the host supports selecting

figures presented in the invoice document for performing an arithmetic operation on the selected figures.” In particular, the Office Action, at page 6, asserts “the online invoicing server 1350 is responsible for tasks including data collection, calculation, storage and report generation.” Although, the portion of *Barry et al.* relied on is not cited, it is presumed that the Office Action is referencing col. 44, lines 64-67.

The disclosure of *Barry et al.* is merely that online invoicing server 1350 is responsible for tasks that include “calculation.” It is noted that while the Office Action, and *Barry et al.*, at col. 44, line 67, refer to Fig. “56,” The figures described in the reference only extend to Fig. 27(b). Therefore Fig. 56 is apparently a typographical error.

In any event, the mere disclosure of some generic “calculation” by an online invoice server in *Barry et al.* is not a disclosure of “wherein the host supports selecting figures presented in the invoice document for performing an arithmetic operation on the selected figures.” *Barry et al.*, in no way, suggests that any calculation is **performed on figures selected from the invoice document**, as claimed.

Further, this cited portion of the reference clearly suggests nothing relative to **highlighting figures** on an image of an invoice document and performing an **arithmetic operation on those highlighted figures**.

Accordingly, since *Barry et al.* lacks any teaching of the above features, it cannot and does not anticipate the subject matter of the instant claims. Therefore, the Examiner is respectfully requested to withdraw the rejection of claims 21-39 under 35 U.S.C. § 102(e).

Therefore, the present application, as amended, overcomes the rejections of record and is in condition for allowance. Favorable consideration is respectfully requested. If any unresolved issues remain, it is respectfully requested that the Examiner telephone the undersigned attorney at (703) 519-9952 so that such issues may be resolved as expeditiously as possible.

To the extent necessary, a petition for an extension of time under 37 C.F.R. §1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 504213 and please credit any excess fees to such deposit account.

Respectfully Submitted,

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Date

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